

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
NORTHERN DIVISION**

IN RE: D&D Hospitality, LLC) Bankruptcy No. 11-83081-JAC-11
)
Debtor.) Chapter 11

**DEBTOR'S RESPONSE TO NORTH TEXAS HOTEL GROUP, LTD.'S
MOTION TO DISMISS FOR IMPROPER VENUE, OR
IN THE ALTERNATIVE, MOTION TO TRANSFER VENUE**

COMES NOW the Debtor-in-possession in the above styled matter, and consents to the transfer of venue of this Chapter 11 case to the Texas federal courts as requested in the creditor's motion. This consent by the Debtor is being filed by agreement of the parties after considerable negotiation. It does not constitute an admission by the Debtor as to any legal or factual allegations of the pending motion or a waiver of any rights, claims or counterclaims of the Chapter 11 Estate against the movant or any other creditor.

Respectfully submitted this 14th day of October, 2011.

/s/ Tazewell Shepard

Tazewell Shepard

Kevin M. Morris

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CERTIFICATE OF SERVICE

This is to certify that I have this October 14, 2011 served the foregoing upon all listed creditors found on the Clerk's Certified Matrix by electronic service through the Court's CM/ECF system and upon the following person and/or by depositing said copies in the U. S. Mail in properly addressed envelopes with adequate postage thereon:

Richard Blythe, Esquire
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Jesse S. Vogtle, Jr.
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/s/ Tazewell Shepard

Tazewell Shepard